November 1, 2023

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

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CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS

By: MV

UNITED STATES OF AMERICA,

Plaintiff.

v.

(1) SALVADOR MUNOZ, and

(2) CASSANDRA SERENE VASQUEZ,

Defendant.

SEALED Case No: EP:23-CR-02135-DCG INDICTMENT

CT 1: 21:846 & 841(a)(1)-Conspiracy to Possess a Controlled Substance with Intent to Distribute; and

CT 2: 21:841(a)(1)-Possession with Intent to Distribute a Controlled Substance

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(C))

Beginning on or about August 31, 2023, continuing to and including on or about September 7, 2023, in the Western District of Texas, Defendant,

(1) SALVADOR MUNOZ and (2) CASSANDRA SERENE VASQUEZ,

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together and with others to the Grand Jury known and unknown, to commit an offense against the United States, in violation of Title 21, United States Code, Section 846, that is to say, the Defendant conspired to possess a controlled substance, which offense involved Nphenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (otherwise known as fentanyl), a Schedule II Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Section 841(a)(1) and the quantity of fentanyl involved in the conspiracy and attributable to Defendant as a result of Defendant's own conduct and as a result of the conduct of other conspirators reasonably

foreseeable to Defendant is a quantity of a mixture or substance containing a detectable amount of fentanyl, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C).

COUNT TWO

(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C))

On or about September 7, 2023, in the Western District of Texas, Defendant,

(1) SALVADOR MUNOZ and (2) CASSANDRA SERENE VASQUEZ,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of Nphenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (otherwise known as fentanyl), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).



JAIME ESPARZA

UNITED STATES ATTORNEY

BY:

Assistant United States Attorney